III.   REMARKS

By this amendment, Applicants have amended claims 1, 4, 8, and 11. As a result, claims 1, 3-4, 6-8, and 10-15 are pending in this application. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the rejections and reserve the right to pursue the full scope of the subject matter of the original claims, or claims that are potentially broader in scope, in the current and/or a related patent application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1, 4, 8 and 11 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Megiddo (US 6,745,231 B1) in view of Togawa (US 2002/0004821 A1), Ishiguri (US 2002/0004837 A1) and Funk (U.S. 5,937,162). Applicants submit that the Office fails to establish a *prima facie* case of obviousness.

For example, with respect to claim 1, Applicants respectfully submit that the Office fails, *inter alia*, to show that the proposed combination of Megiddo, Togawa, Ishiguri, and Funk allegedly teach or suggest "the destination e-mail address comprising an e-mail address of the chunk assembly agent" as claimed therein.

In support of the rejection, the Office admits that Megiddo fails to teach this feature, but points to Togawa, paragraphs 113, 122, 206-209, 214, and 217, to allegedly cure this deficiency. Applicants respectfully disagree.

In paragraph 113, Togawa teaches that a mailer is installed and when "executed by the CPU, this mailer creates an e-mail and sends this e-mail to a designated mail address (destination) as well as receives an e-mail from another mail address (mail source)." Applicants contend that installing a mailer, and sending and receiving e-mail

does not teach or suggest "the destination e-mail address comprising an e-mail address of the chunk assembly agent" as provided in claim 1.

In paragraph 122, Togawa teaches temporarily sending an e-mail to a "mailer server 11b, where the mailer server 11b exams the mail address described in the e-mail and then sends the e-mail to the mail server 11a which manages the mail address of the mail-destination client 10a-1." However, Applicants contend that the mail server 11a of Togawa does not teach or suggest the chunk assembly agent of claim 1.

In paragraphs 206-209, Togawa teaches breaking e-mail data if it is larger than what is receivable by the destination and the mailer server, and subsequently recombining the e-mail data. However, Applicants assert that Togawa does not teach or suggest each chunk e-mail including a same mail header having a same destination e-mail address, the destination e-mail address comprising an e-mail address of the chunk assembly agent.

In paragraph 214, Togawa teaches sending e-mail to a "managing server 33a via the mail server 11a … [that] examines the system environment information of the client 10." In paragraph 217, Togawa teaches that the "managing server 33a processes the e-mail data of the received e-mail into a form received by the destination based on the system environment information table 30 and then send the resulting e-mail to the mail server 11b via the managing server 33b." Applicants assert that sending the e-mail to the managing server does not teach or suggest a same destination e-mail address comprising an e-mail address of the chunk assembly agent.

Applicants also assert that the proposed combination of the cited references fails to teach or suggest "each chunk e-mail including a same mail header having a same destination e-mail address, the chunk number, and the chunk count" as claimed therein.

In light of the above, Applicants respectfully request withdrawal of the rejections of claim 1 as allegedly being unpatentable over the proposed combination of Megiddo, Togawa, Ishiguri, and Funk.

With respect to claim 4, Applicants submit that the Office fails, *inter alia*, to show that the proposed combination of Megiddo, Togawa, Ishiguri, and Funk teaches or suggests a method for enhancing security of e-mails transmitted from a sender to a receiver over a data transmission network that includes all the features claimed therein. For example, for reasons that should be clear from the discussion of the proposed combination of Megiddo, Togawa, Ishiguri, and Funk above, Applicants submit that the proposed combination of Megiddo, Togawa, Ishiguri, and Funk fails to teach or suggest the method of claim 4, including "the destination e-mail address comprising an e-mail address of the chunk assembly agent" and "each chunk e-mail including a same mail header having a same destination e-mail address, the chunk number, and the chunk count" as claimed therein. As a result, Applicants respectfully request withdrawal of the rejections of claim 4 as allegedly being unpatentable over the proposed combination of Megiddo, Togawa, Ishiguri, and Funk.

With respect to claim 8, Applicants submit that the Office fails, *inter alia*, to show that the proposed combination of Megiddo, Togawa, Ishiguri, and Funk teaches or suggests a security system that includes all the features claimed therein. For example, for reasons that should be clear from the discussion of the proposed combination of

Megiddo, Togawa, Ishiguri, and Funk above, Applicants submit that the proposed combination of Megiddo, Togawa, Ishiguri, and Funk fails to teach or suggest the system of claim 8, including "the destination e-mail address comprising an e-mail address of the chunk assembly agent" and "each chunk e-mail of said plurality of chunks includes a same mail header having a same destination e-mail address, the chunk number, and the chunk count" as claimed therein. As a result, Applicants respectfully request withdrawal of the rejections of claim 8 as allegedly being unpatentable over the proposed combination of Megiddo, Togawa, Ishiguri, and Funk.

With respect to claim 11, Applicants submit that the Office fails, *inter alia*, to show that the proposed combination of Megiddo, Togawa, Ishiguri, and Funk teaches or suggests a security system that includes all the features claimed therein. For example, for reasons that should be clear from the discussion of the proposed combination of Megiddo, Togawa, Ishiguri, and Funk above, Applicants submit that the proposed combination of Megiddo, Togawa, Ishiguri, and Funk fails to teach or suggest the system of claim 11, including "the destination e-mail address comprising an e-mail address of the chunk assembly agent" and "each chunk e-mail of said plurality of chunks includes a same mail header having a same destination e-mail address, the chunk number, and the chunk count" as claimed therein. As a result, Applicants respectfully request withdrawal of the rejections of claim 11 as allegedly being unpatentable over the proposed combination of Megiddo, Togawa, Ishiguri, and Funk.

Claims 3, 6-7 and 10 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Megiddo in view of Togawa, Ishiguri and Funk as applied to claims 1, 4, and 8 above, and further in view of Grobman (US 2004/0190722 A1) and

Muschenborn (US 2002/0191796 A1). Claims 12-15 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Megiddo in view of Togawa, Ishiguri and Funk as applied to claims 1, 4, 8 and 11 above, and further in view of Devanagondi et al. (US 7,317,730 B1).

With respect to claims 3, 6-7, 10, and 12-15, Applicants respectfully submit that the Office fails to show that each and every feature of the claimed invention is taught or suggested by the proposed combination of Megiddo, Togawa, Ishiguri, Funk, and Grobman and Muschenborn, or Devanagondi. Applicants note that the Office relies on its interpretation of the proposed combination of Megiddo, Togawa, Ishiguri, and Funk as allegedly teaching all the features of independent claims 1, 4, 8, and 11, from which these claims depend. To this extent, Applicants hereby incorporate the arguments presented above for claims 1, 4, 8, and 11. Further, Applicants note that the proposed combination of Grobman and Muschenborn, or Devanagondi, even if, *arguendo*, proper, fails to address the deficiencies of Megiddo, Togawa, Ishiguri, and Funk cited above with respect to claims 1, 4, 8, and 11. As a result, Applicants request withdrawal of the rejection of claims 3, 6-7, 10, and 12-15 as allegedly being unpatentable over the proposed combination of Megiddo, Togawa, Ishiguri, Funk, and Grobman and Muschenborn, or Devanagondi.

Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such

combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary and/or in a related patent application, either of which may seek to obtain protection for claims of a potentially broader scope.

IV.   CONCLUSION

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

/Elaine Chi/

Date: June 16, 2010

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